

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re: PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

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INFORMATIVE
MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING SEPTEMBER 21-22, 2022 OMNIBUS HEARING

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for September 21–22, 2022, Omnibus Hearing* [Case No. 17-3283, ECF No. 22038], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; (iii) Joshua A. Esses, jesses@proskauer.com; and (iv) Matthew A. Skrzynski, mskrzynski@proskauer.com of Proskauer Rose LLP.

2. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report.

3. Joshua A. Esses and/or Brian S. Rosen of Proskauer Rose LLP will appear and seek to be heard on the *Four Hundred Ninety-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to Claims for Which the Debtors Are Not Liable* [Case No. 17-3283, ECF No. 21741] (the "Four Hundred Ninety-Second Omnibus Objection") with respect to Proof of Claim No. 27270, as well as any and all related objections, responses, statements, joinders, and replies to the Four Hundred Ninety-Second Omnibus Objection.

4. Matthew A. Skrzynski and/or Brian S. Rosen of Proskauer Rose LLP will appear and seek to be heard on the *Five Hundred Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [Case No. 17-3283, ECF No. 21763] (the "Five Hundred Seventh Omnibus Objection") with respect to the *Petition in Opposition to Discharge of Claim as to Jose R. Lopez Medina with a Request for Hearing and a Motion Requesting a Lift of Stay* [Case No. 17-3283, ECF No. 21994], as well as any and all related objections, responses, statements, joinders, and replies to the Five Hundred Seventh Omnibus Objection.

5. Brian S. Rosen of Proskauer Rose LLP will appear and seek to be heard on the *Motion Requesting Allowance and Payment of Administrative Expense Claim filed by Pablo Melani Curra and Diana Velez Martinez* [Case No. 17-3283, ECF No. 21229] (the “Curra/Martinez Administrative Expense Motion”), as well as any and all related objections, responses, statements, joinders, and replies to the Curra/Martinez Administrative Expense Motion.

6. Martin J. Bienenstock, Brian S. Rosen, Joshua A. Esses, and Matthew A. Skrzynski reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: September 15, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
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EXHIBIT A

PARTY APPEARANCE COVER SHEET

PARTY APPEARANCE COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico
Party Name Abbreviation (For Use with Zoom)	FOMB
Omnibus Hearing Participant	
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none">• Name,• Email,• Law Firm,• Phone Number• Docket Entry No. for the Attorney's Notice of Appearance• Zoom Screen Name	<p>Martin J. Bienenstock mbienenstock@proskauer.com Proskauer Rose LLP 212-969-4530 Docket Entry No. 90 FOMB/ Bienenstock, Martin/ Proskauer Rose LLP</p>
	<p>Brian S. Rosen brosen@proskauer.com Proskauer Rose LLP 212-969-3380 Docket Entry No. 1902 FOMB/ Rosen, Brian/ Proskauer Rose LLP</p>
	<p>Joshua A. Esses jesses@proskauer.com Proskauer Rose LLP 212-969-3667 Docket Entry No. 4708 FOMB/ Esses, Joshua/ Proskauer Rose LLP</p>
	<p>Matthew A. Skrzynski mskrzynski@proskauer.com Proskauer Rose LLP 212-969-3726 Docket Entry No. 22173 FOMB/ Skrzynski, Matthew/ Proskauer Rose LLP</p>